

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

DECLARATION OF LAURA E. LYONS

Pursuant to 28 U.S.C. § 1746, I, Laura E. Lyons, hereby declare as follows:

1. I am a resident of the State of Hawai‘i. I am over the age of 18 and have personal knowledge of all the facts stated herein, except as to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. In August 2021, I was appointed as the Interim Vice Provost for Academic Excellence for the University of Hawai‘i at Mānoa (“University”). Previously I was the Associate Vice Chancellor for Academic Affairs and the Interim Dean of the College of Languages, Linguistics, and Literature.

3. As the Interim Vice Provost for Academic Excellence, I am responsible for overseeing the development and review of all academic programs offered at the University, which includes the Library and Information Science (“LIS”) degrees in the School of Communication and Information Sciences in the College of Social Sciences. As such, I am familiar with the programs and the externally funded research undertaken by the LIS (“Program”).

4. The University hosts the Program, the only professionally-accredited library science graduate program in the state. Through the Program, the University is responsible for the education of leaders in diverse information environments, with an emphasis on Hawai‘i and the Asia-Pacific region. The Program’s graduates constitute roughly two thirds of the library, museum and archive professionals in Hawai‘i.

5. I submit this declaration in connection with Executive Order 14,238, “Continuing the Reduction of the Federal Bureaucracy,” which directed seven federal agencies, including the Institute of Museum and Library Services (“IMLS”), to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associate personnel to the minimum presence and function required by law.

6. Given my experience, I believe that Executive Order 14,238 will cause IMLS to be unable to administer financial awards and/or programs on which the University relies and on which it expects to rely in the future, causing significant harm to the State of Hawai‘i and the University.

The Museum Library Services Act

7. In 1996, Congress established IMLS by the Museum and Library Services Act of 1996, which amended the Museum Services Act (20 U.S.C. § 961 *et seq.*). The Library Services and Technology Act, which was enacted as part of the Museum and Library Services Act in 1996, authorized the distribution of federal funding to help support libraries across the United States. The Museum and Library Services Act was most recently reauthorized in 2018, codified at 20 U.S.C. § 9101 *et seq.*

8. IMLS, which administers the Library Services and Technology Act, is authorized to provide federal funding to institutions of higher education. 20 U.S.C. § 9101 *et seq.*; in particular, § 9162 (National leadership grants). The University is an institution of higher education.

9. In order to receive funds under the Library Services and Technology Act, each institution of higher education must submit to IMLS a proposal, which describes the institution's needs and goals and the ways in which the institution intends to use the federal funding to meet those needs.

10. Grants, contracts, cooperative agreements, and other arrangements or forms of IMLS assistance are awarded on a competitive basis. 20 U.S.C. § 9162. Section 9162 provides that:

From the amounts reserved under section 9131(a)(1)(B) of this title for any fiscal year the Director shall establish and carry out a program to enhance the quality of library services nationwide and to provide coordination between libraries and museums, including by carrying out activities such as-

(1) building workforce and institutional capacity for managing the national information infrastructure and serving the information and education needs of the public;

(2)

(A) research and demonstration projects related to the improvement of libraries or the enhancement of library and information services through effective and efficient use of new and emerging technologies, including projects that enable library users to acquire digital literacy skills and that make information resources more accessible and available; and

(B) dissemination of information derived from such projects;

(3) conserving, preserving, and digitizing library materials and resources, giving priority to projects emphasizing coordination, optimizing conditions for storage and future use, offering staff training, avoiding duplication, and providing access by researchers beyond the institution or library entity undertaking the project;

(4) enhancing the ability of libraries to provide services to affected communities in the event of an emergency or disaster through-

(A) the development of national, regional, statewide, or local emergency and disaster management plans that-

(i) address communication and coordination of information and services for affected communities; and

(ii) ensure the preservation of knowledge and library collections; and

(B) the implementation of the emergency and disaster management plans described in subparagraph (A), or otherwise enabling libraries to provide services consistent with this chapter to affected communities in the event of an emergency or disaster; and

(5) model programs demonstrating cooperative efforts between libraries and museums.

20 U.S.C. §§ 9162(a)(1)-(5).

The Institute of Museum and Library Services' Impact in Hawai'i

11. In 2024, IMLS invested \$15.287 million in libraries across the United States under its National Leadership Grants - Libraries program. The University is set to receive \$147,420, which represents the Federal share of the activities in the approved proposal, totaling 100 percent.¹

12. The University uses these federal funds to support many of its programs, including: research about libraries, archives, and museums; education of graduate university students; collection management and development of its library materials; outreach and engagement with University stakeholders and community members.

13. The University will also use these federal funds to pay a portion of the salaries for 1 full time employee and 1 graduate student research assistant.

¹ A chart showing the IMLS FY 2016 – FY 2025 Budget Appropriations can be found here: <https://www.imls.gov/sites/default/files/2024-05/imls-appropriations-history-2016-2025.pdf>.

14. In addition to administering federal funding to institutions of higher education, IMLS also provides the following programs and services: facilitates national and international communities of practice — such as those supporting indigenous librarianship and cultural stewardship— that have directly enhanced the University’s ability to implement community-led, place-based information practices. The IMLS also provides essential publications and guidance on topics like digital preservation, inclusive metadata, and knowledge organization systems, which faculty and students use to develop globally-informed approaches to cataloging, archiving, and access for Hawaiian and Pacific collections.

15. The University’s budget for this year has relied on receiving \$147,420 and we made plans and allocated funding for research and student support based on the anticipated receipt of Federal funding promised. For example, the University’s IMLS-funded, 1-year planning grant (Application No. LG-256733-OLS-24) includes budget allocations for compensating 16 community consultants, convening a national advisory board of 4 cultural heritage collections experts, and supporting 1 graduate student’s tuition, research training, and travel. These components are essential to the University’s ability to fulfill its mission of serving the people of Hawai‘i and the Pacific region through high-impact research, collaborative engagement, and the advancement of knowledge stewardship.

16. The University plans to continue seeking support from IMLS for future initiatives that build upon current research and partnerships. For example, the University is preparing an Applied Research proposal that will extend the work of the current planning grant by expanding participation, deepening national collaboration, and implementing tested models for improved access to cultural heritage materials across institutions. In addition, the University was invited to submit a full proposal earlier this month (March 2025) for IMLS funding to support workforce

development as part of the *Ehuehu 'o Mānoa: An Immersive Place-Based Experience* project (Application No. RE-257110-OLS, IMLS Laura Bush 21st Century Librarian Program).

17. Any pause in our federal funding would disrupt the implementation timeline of active projects and compromise our ability to fulfill planned obligations to community partners, students, and advisory board members. It would delay critical research activities, including national data collection and analysis, and prevent timely disbursement of consultant and student support. These setbacks would erode trust with collaborators and undermine the University's capacity to contribute to national efforts in information science innovation.

18. The uncertainty of getting reimbursed has an immediate chilling effect on our ability to provide services, support students, and advance research. Faculty are forced to delay hiring graduate assistants, committing to travel, and initiating consultant agreements — all of which are foundational to the success of our projects. Students face uncertainty around tuition support and professional development opportunities, while community partners may experience delays in engagement, causing strain on relationships and momentum.

19. The University has a long-standing record of responsible stewardship and successful performance in administering IMLS funding. Between 2009 and 2024, the University has been awarded a total of \$1,370,325 to support seven different projects across multiple campuses and divisions. IMLS program officers have consistently engaged with University project teams and provided constructive feedback, reflecting a strong and collaborative working relationship grounded in trust and accountability.

20. In the next four months, the University is scheduled to receive disbursements/reimbursements of \$147,420 under our current Federal awards. These monies have been appropriated by IMLS but have not been received or spent down by the University.

21. If we do not receive such disbursements/reimbursements within the next four months, it will significantly hinder our ability to carry out planned project activities, compensate consultants and advisory board members, and provide tuition and travel support to students. Delays will disrupt the carefully sequenced phases of research, damage timelines for deliverables, and risk the loss of participation from community partners and collaborators who have committed their time and expertise.

22. The University has relied on IMLS-funded programs, studies, and national assessments to guide institutional planning, inform curriculum development, and align our practices with evolving field-wide standards. Publications and resources related to digital stewardship, inclusive cataloging, and indigenous knowledge systems have been particularly valuable to our research and instructional efforts.

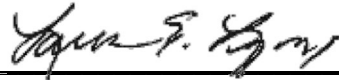
23. The elimination or delay of these resources would impede our ability to make evidence-based decisions and stay current with emerging best practices in the field. Without timely access to national surveys, guidance, and studies, our programs risk becoming misaligned with professional standards, and our ability to prepare students and collaborate with community partners would suffer as a result.

24. The termination or delay of IMLS funding will cause immediate harm to communities that rely on timely, responsive access to information, research, and educational support. It will disrupt services to indigenous practitioners, halt planned engagements with community consultants, and interrupt student support at a critical stage in their academic and professional development. These harms extend beyond the University to affect citizens across multiple states who are part of national collaborative efforts, particularly those in Native Hawaiian

and Pacific Islander communities seeking connection to cultural heritage through libraries, archives, and museums.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on March 25, 2025, at Honolulu, Hawai'i.

A handwritten signature in black ink, appearing to read "Laura E. Lyons", is positioned above a horizontal line.

Laura E. Lyons